

Update of David McGraw's WSS Letter (5/28/98)

April 2, 2001

MEMORANDUM

TO: Distribution

FROM: David McGraw, Director
Environment, Health, & Safety Division

SUBJECT: Work Smart Standards Update Process

In 1996, the Department of Energy accepted Berkeley Lab's set of Work Smart Standards (WSS) within Appendix G of Contract 98. The WSS set was developed through the Necessary and Sufficient process in November 1996 to assure adequate protection for Lab employees, the public and the environment. It is composed of federal, state and local laws, as well as national and international consensus standards. Moreover, this process has also screened and omitted many DOE Orders that are not applicable to the kind of work conducted at LBNL. These standards were selected on the basis of the type of work performed as well as the hazards present at the Laboratory and serve as the agreed upon basis for operating the Lab in a safe, efficient and cost-effective manner.

Because of the dynamic nature of the Laboratory's research activities and the changes that may occur in the regulatory environment, it is necessary to ensure our WSS set remains current. Updates to our WSS set would be required if Divisions engage in work activities that are not covered by the existing set, and/or if the laws and standards comprising the set change. Ross Fisher of the EH&S Division Safety Engineering Group has been assigned the responsibility of being the LBNL WSS Coordinator for managing this effort. His responsibilities are as follows:

1. In conjunction with the DOE BSO WSS Coordinator, administers the annual WSS Review and Update Process.
2. Assigns teams of subject matter experts to review standards to identify changes in regulations that trigger updates to the WSS set.

Note: a "Change" is defined as a modification in a standard's citation number, the addition or deletion of requirements within an existing standard, or the addition of an entirely new standard.

3. Assigns teams of appropriate Division personnel and technical expertise to identify new work and/or changes to existing work within each Division that may impact the WSS set.
4. Analyzes the results of the team reviews, meets with appropriate Division personnel and technical experts as necessary, compiles the findings and generates the annual review report and WSS change recommendations.

The enclosed flow charts delineate the process for updating our WSS set.

An annual roll up will be provided to me in order that proposed changes may be reviewed with the appropriate parties and that necessary updates are made to the WSS set.

If you have any questions regarding the WSS update process, please contact Ross Fisher at extension 6934.

Distribution:

Sally Benson

Jeffrey Chung

Ross Fisher

Karl Olson

Robin Wendt

Division Safety Coordinators

EH&S Division Liaisons

EH&S Division Group Leaders

EH&S Division Technical Leads

Richard Nolan, Berkeley Site Office



Environment, Health & Safety Division

May 28, 1998
DIR-98-81

MEMORANDUM

TO: Distribution

FROM: David McGraw, Director *David McGraw*
Environment, Health, & Safety Division

SUBJECT: Work Smart Standards Update Process

The Department of Energy has accepted Berkeley Lab's set of Work Smart Standards (WSS) within Appendix G of the newly negotiated UC contract extension. The WSS set was developed through the Necessary and Sufficient process in November, 1996 to assure adequate protection for Lab employees, the public and the environment. It is composed of federal, state and local laws, as well as national and international consensus standards but does not include several DOE Orders not applicable to the kind of work conducted at LBNL. These standards were selected on the basis of the type of work performed as well as the hazards present at the Laboratory and serve as the agreed upon basis for operating the Lab in a safe, efficient and cost-effective manner.

Because of the dynamic nature of the Laboratory's research activities and the changes that may occur in the regulatory environment, it is necessary to ensure our WSS set remains current. Updates to our WSS set would be required if Divisions engage in work activities that are not covered by the existing set, and/or if the laws and standards comprising the set change. Larry McLouth of the EH&S Field Support Department has been assigned the responsibility as the WSS Coordinator for managing this effort. In this role, he will:

- 1) Meet with EH&S Division Liaisons and technical experts to identify new work activities and/or changes to existing work activities performed in Divisions that may impact the WSS set. An analysis would then be made to determine the appropriate requirements and controls for the activities not covered by the current WSS set.
- 2) Query EH&S Division Group Leaders and Technical Leads to identify changes in regulations that would trigger an update to the WSS set. Note: a "change" is defined as a modification in a standard's citation number, the addition or deletion of requirements within an existing standard, or the addition of an entirely new standard. WSS set updates would be required for changes that are directly applicable to the activities and hazards at LBNL.
- 3) Coordinate WSS Set update activities with the EH&S Office of Assurance and Assessment.

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The enclosed flow charts delineate the process for updating our WSS set.

An annual roll up will be provided to me in order that proposed changes may be reviewed with the appropriate parties and that necessary updates are made to the WSS set.

If you have any questions regarding the WSS update process, please contact Larry McLouth at extension 5286.

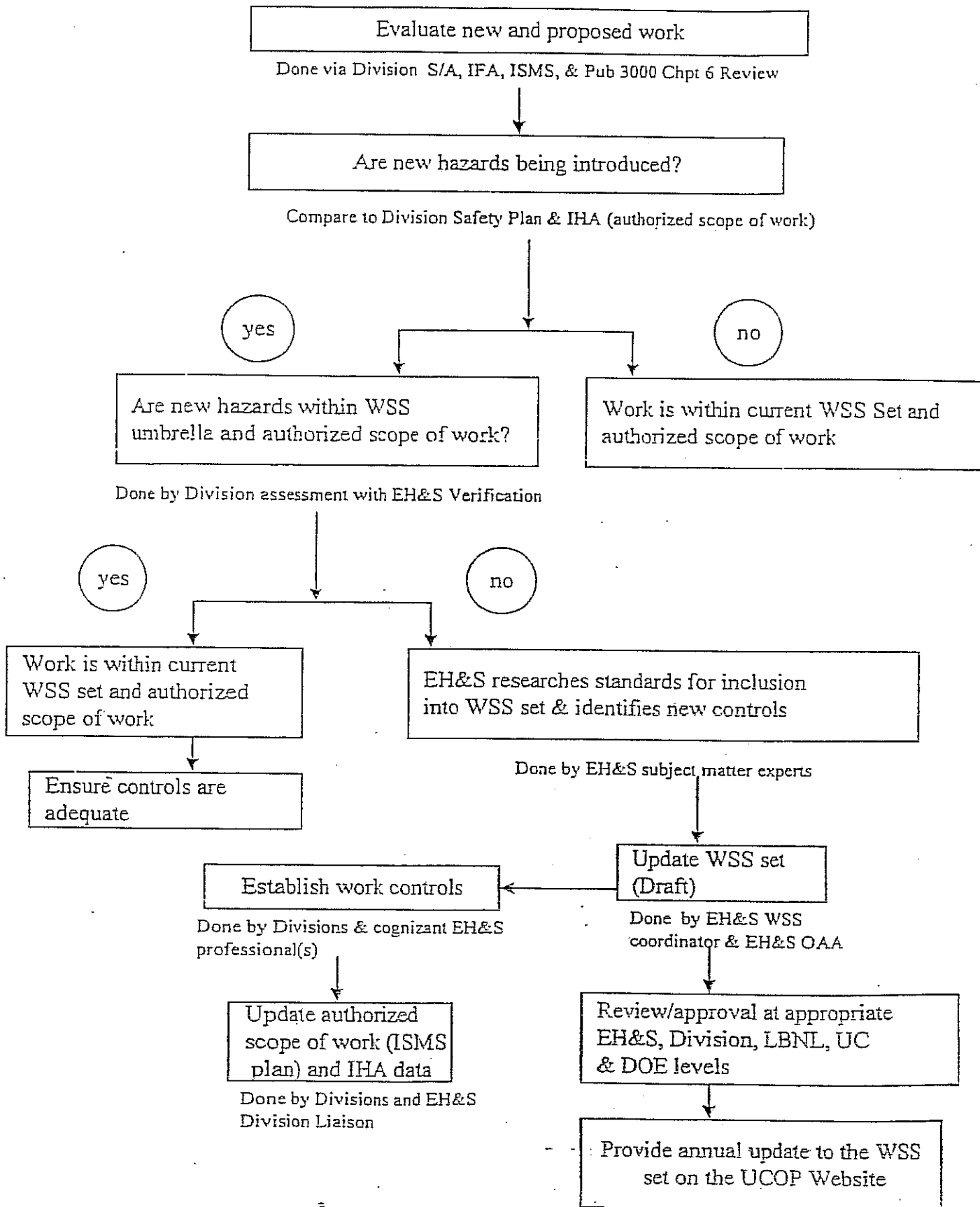
Distribution:

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Division Safety Coordinators
EH&S Division Liaisons
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DCM:lm

Work Smart Standard Update Process Flow

Case I: Changes in Division Operations



Work Smart Standard Update Process Flow

Case II: Changes in the Regulatory Environment

